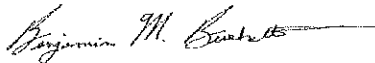


ORIGINAL

Approved:   
BENJAMIN M. BURKETT  
Assistant United States Attorney

Before: HONORABLE JENNIFER E. WILLIS  
United States Magistrate Judge  
Southern District of New York

23 MAG 5286

UNITED STATES OF AMERICA

v.

ALEXANDRE REGIS,

Defendant.

SEALED COMPLAINT

Violations of 18 U.S.C. §§ 912 and 2

COUNTY OF OFFENSE:  
NEW YORK

DOC #

SOUTHERN DISTRICT OF NEW YORK, ss.:

CHRISTOPHER HARPER, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE

**(Impersonating an Officer or Employee of the United States)**

1. From at least on or about May 5, 2023, through at least on or about May 19, 2023, in the Southern District of New York and elsewhere, ALEXANDRE REGIS, the defendant, falsely assumed and pretended to be an officer and employee acting under the authority of the United States and a department, agency and officer thereof, and acted as such, and in such pretended character demanded and obtained money, paper, a document, and a thing of value, to wit, REGIS pretended to be a Special Agent with the FBI and, in such pretended character, demanded that the Apostille and Authentication Unit of the New York State Department of State's Division of Licensing Services in New York, New York, process certain documents, expedite the processing of those documents, and waive certain fees associated with processing those documents.

(Title 18, United States Code, Sections 912 and 2)

COUNT TWO

**(Impersonating an Officer or Employee of the United States)**

2. On or about May 22, 2023, in the Southern District of New York and elsewhere, ALEXANDRE REGIS, the defendant, falsely assumed and pretended to be an officer and employee acting under the authority of the United States and a department, agency and officer thereof, and acted as such, and in such pretended character demanded and obtained money, a paper, a document, and a thing of value, to wit, REGIS pretended to be a Special Agent with the FBI and

an agent of the National Security Agency and, in such pretended character, sought entry to the New York State Supreme Court building located at 60 Centre Street, New York, New York.

(Title 18, United States Code, Sections 912 and 2)

The bases for my knowledge and the foregoing charges are, in part, as follows:

3. I am a Special Agent with the FBI and have been involved in the investigation of this matter. I base this affidavit on my participation in that investigation, as well as on my conversations with other law enforcement agents and other individuals, my examination of various reports, recordings, photographs, and records, and my training and experience. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

**REGIS Pretended to be an FBI Agent at the Apostille Office**

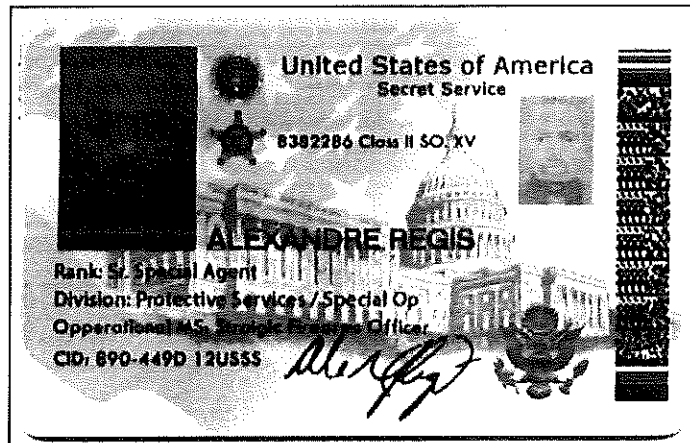
4. Based on my training and experience and my participation in this investigation, I am familiar with an organization known as the Apostille and Authentication Unit ("Apostille Unit") of the New York State Department of State's ("NYS DOS") Division of Licensing Services. Among other things, the Apostille Unit offers document authentication services with respect to public documents including, for example, birth, marriage, and death certificates. The Apostille Unit authenticates documents by issuing either an "Apostille" or a "Certificate of Authentication," each of which is a one-page document bearing a blue laser-printed facsimile of the NYS DOS Seal.

5. Based on my review of recordings, photographs, and records obtained from the NYS DOS and the Apostille Unit, conversations with an employee of the Apostille Unit ("Apostille Employee-1"), and conversations with an investigator employed by the NYS DOS ("NYS DOS Investigator-1"), I have learned, in substance and in part, the following:

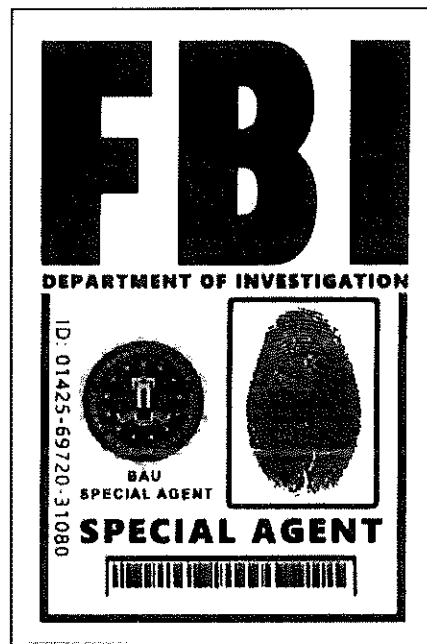
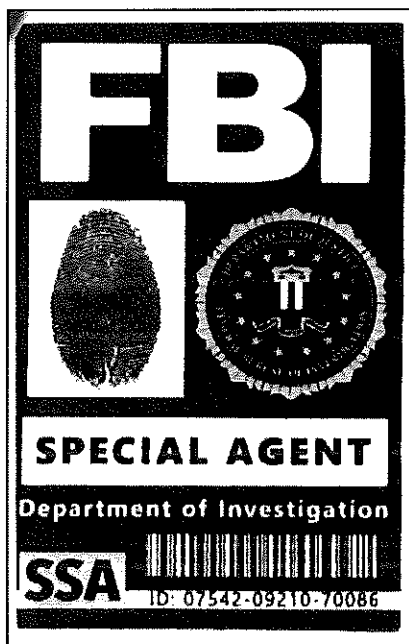
a. On or about May 8, 2023, an Apostille/Certificate of Authentication Request (the "Apostille Request") listing the "Requestor" as "Alexandre Regis" was received by the Apostille Unit. Various documents were attached to the Apostille Request, including, among other documents:

i. an identification card featuring a photograph of an individual and identifying "ALEXANDRE REGIS" as a "Sr. Special Agent" in the "Protective Services / Special

Op” division of the “United States of America Secret Service,” an image of which is below:

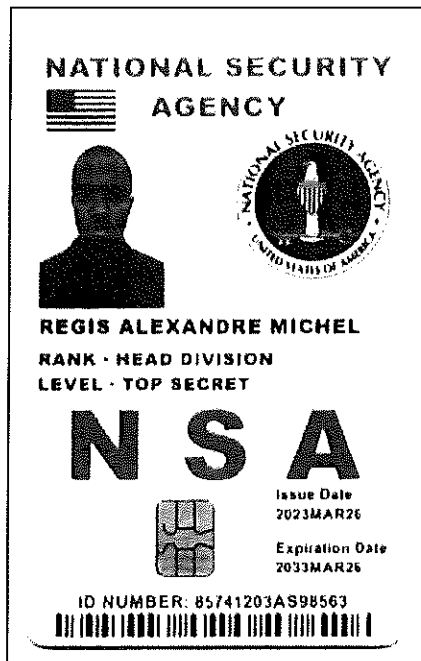


ii. two “FBI” identification cards featuring an unidentified fingerprint, the words “Department of Investigation,” and the title “Special Agent,” images of which are below:

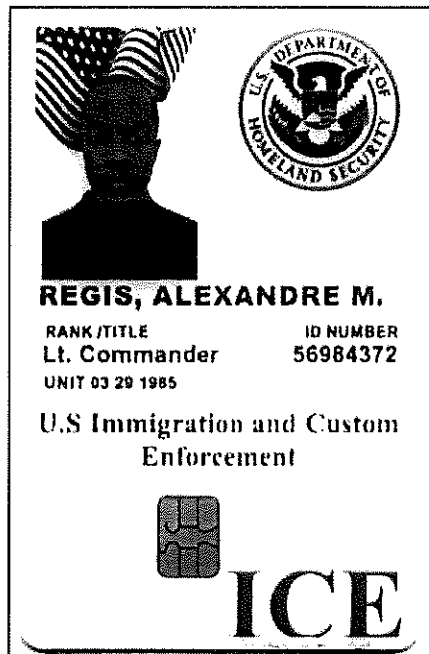


iii. an identification card featuring a photograph of an individual and identifying “REGIS ALEXANDRE MICHEL” as an agent of the “National Security Agency” with

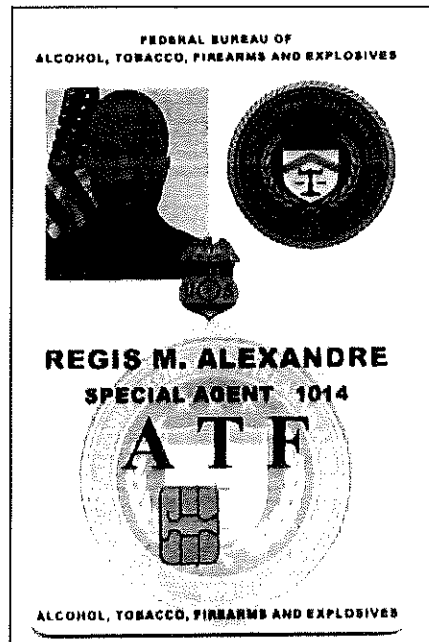
the “Rank” of “Head Division” and the “Level” of “Top Secret,” an image of which is below:



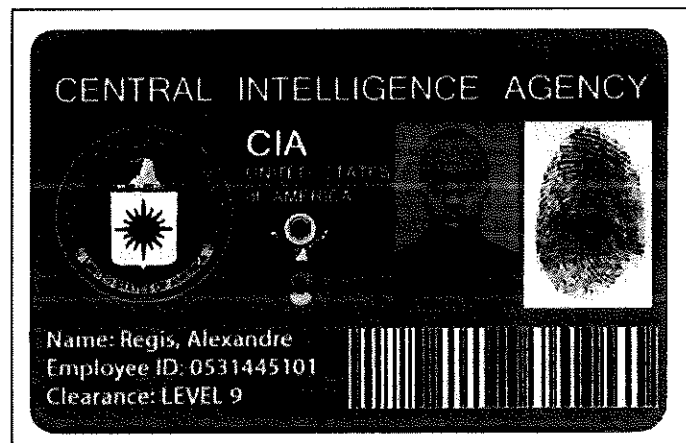
iv. an identification card featuring a photograph of an individual, bearing a seal with the words “U.S. Department of Homeland Security” and identifying “REGIS, ALEXANDRE M.” as a “Lt. Commander” of “U.S. Immigration and Custom Enforcement,” an image of which is below:



v. an identification card featuring a photograph of an individual and identifying “REGIS M. ALEXANDRE” as a “SPECIAL AGENT” of the “Federal Bureau of Alcohol, Tobacco, Firearms and Explosives,” an image of which is below:



vi. and an identification card featuring a photograph of an individual and an unidentified fingerprint and identifying “Regis, Alexandre” as an employee of the “Central Intelligence Agency” with Clearance Level 9, an image of which is below:



b. Another of the Apostille Request’s attachments was a letter (the “Fingerprints Letter”) dated May 5, 2023, bearing the signature “Alex Regis” above the title “FBI SPECIAL AGENT,” and stating, in part:

I AM WRITING TO ATTEST TO THE FACT THAT REGIS ALEXANDRE’S FINGERPRINTS ARE TO BE REMOVED FROM THE POLICE DATABASE.

AS AN FBI SPECIAL AGENT, I HAVE ACQUIRED CREDIBLE EVIDENCE THAT HIS PREVIOUS ARREST WAS A MISTAKE. THE REASON FOR THE REMOVAL IS THAT MR. ALEXANDRE WAS NEVER INVOLVED IN ANY WRONGDOING AND SHOULD NOT BE SUBJECT TO FURTHER INVESTIGATION . . . I, THEREFORE, REQUEST THAT YOU REMOVE HIS FINGERPRINTS FROM THE DATABASE WITH IMMEDIATE EFFECT.

c. Another of the Apostille Request's attachments was a document dated May 5, 2023, titled "NON-NEGOTIABLE CONTRACT" (the "Handguns Contract"), bearing the signature "Alex Regis" above the printed words "SPECIAL AGENT REGIS" and stating, in part:

THIS AGREEMENT . . . IS ENTERED INTO BETWEEN THE DEPARTMENT OF JUSTICE . . . REPRESENTED BY SAINSLLOT BELIZAIRE-STATE OF NEW YORK, LOCATED IN QUEENS COUNTY AND SPECIAL AGENT REGIS . . . ON THE 1ST DAY OF MAY, 2023.

1. THE DOJ SHALL PROVIDE THE AGENT WITH TWO HANDGUNS, ONE FOR PERSONAL USE AND ONE FOR BUSINESS USE. THE MAKE, MODEL, AND SPECIFICATIONS OF THE HANDGUNS SHALL BE GLOCK 19M & BERETTA M9(SEMI-AUTOMATIC) BRAND NEW ISSUED BY THE DOJ WITH BULLETS FOR EACH HANDGUN . . .

THIS AGREEMENT SHALL REMAIN IN EFFECT FOR THE DURATION OF THE AGENT'S EMPLOYMENT WITH THE DOJ . . . .

d. On or about May 17, 2023, an individual later identified as REGIS entered the Apostille Unit's offices at 123 William Street, New York, New York (the "Apostille Office"). REGIS spoke with Apostille Employee-1 and showed Apostille Employee-1 a document stating, in substance and in part, that REGIS was allowed to have the Apostille process done for free and that he was entitled to same-day service. Apostille Employee-1 told REGIS that he was not eligible for same-day service, and REGIS left the Apostille Office. Apostille Employee-1 recognized REGIS because REGIS also had visited the Apostille Office the day before, on or about May 16, 2023.

e. On or about May 18, 2023, Apostille Employee-1 reviewed the Apostille Request and its attachments and, upon doing so, recognized the individual pictured in the photographs included in the Apostille Request's attachments as the individual who had visited the Apostille Office the day before, on or about May 17, 2023, *i.e.*, REGIS.

f. REGIS returned to the Apostille Office on or about May 18, 2023, where he spoke with NYS DOS Investigator-1. REGIS showed NYS DOS Investigator-1 certain documents, including a document stating, in substance and in part, that REGIS was exempt from paying a fee for Apostille authentication.

g. REGIS returned to the Apostille Office on or about May 19, 2023, where he again spoke with NYS DOS Investigator-1 and another employee of the NYS DOS ("NYS DOS Employee-1"). NYS DOS Employee-1 audio- and video-recorded portions of his and NYS DOS

Investigator-I's conversation with REGIS, during which REGIS said, in substance and in part, that he worked for the FBI under the Department of Justice; that he reported to the U.S. General, who he later clarified was the "U.S. Attorney General"; and that he was a Special Agent.<sup>1</sup>

**REGIS Pretended to Be an FBI Agent and an NSA Agent at the Courthouse**

6. Based on my review of reports, photographs, and records and my conversations with a New York State Court Officer (the "CO"), I have learned, in substance and in part, the following:

a. On or about May 22, 2023, the CO was assigned to work a 9:30 a.m.-to-5:30 p.m. tour of duty at the New York State Supreme Court Building located at 60 Centre Street, New York, New York (the "Courthouse").

b. On or about May 22, 2023, at approximately 11:00 a.m., an individual later identified as ALEXANDRE REGIS, the defendant, entered the Courthouse and, in a security area at the Courthouse's entrance, took out a pair of handcuffs and a boxcutter in such a way that caused the CO to think that REGIS meant to have these items vouchered by the officers working at the Courthouse. REGIS had a briefcase with him, which he placed on a conveyor belt that carried the briefcase through an x-ray machine, as part of standard security screening at the Courthouse. As the briefcase passed through the x-ray machine, the CO observed that the briefcase contained what appeared to be a law enforcement shield. The briefcase was opened, and the CO observed that the shield was a purported FBI shield. The briefcase also contained, among other things, a body-worn camera and an empty gun holster.

c. REGIS presented the CO with documentation, including, among other things: (i) an FBI identification card featuring an unidentified fingerprint, the phrase "Department of Investigation," and the title "Special Agent"; and (ii) an identification card featuring a photograph of an individual and identifying "REGIS ALEXANDRE MICHEL" as an agent of the "National Security Agency" with the "Rank" of "Head Division" and the "Level" of "Top Secret." Images of these identification cards are below:

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<sup>1</sup> ALEXANDRE REGIS, the defendant, returned to the Apostille Office on May 30, 2023, where he again spoke with NYS DOS Investigator-I. REGIS explained to NYS DOS Investigator-I that he wanted to become an agent because the police were visiting him and, by becoming an agent, he would obtain a new identity.





**Identification of ALEXANDRE REGIS**

7. Based on my comparison of the video recording taken by NYS DOS Employee-1 and the photographs included in the Apostille Request's attachments, including the photographs of an individual featured on the identification cards therein, with images of ALEXANDRE REGIS, the defendant, in law enforcement databases, as well as the similarities between the names included on the identification cards included in the Apostille Request's attachments and REGIS's name, I believe that REGIS is the same individual who submitted the Apostille Request and who visited the Apostille Office on or about May 16, 17, 18, 19 and 30 of 2023, as described above.

8. Based on my review of arrest records and my comparison of the photograph of the individual featured on the "National Security Agency" identification card presented to the CO with images of ALEXANDRE REGIS, the defendant, in law enforcement databases, as well as the similarities between the name featured on that identification card — "REGIS ALEXANDRE MICHEL" — with REGIS's name, I believe that REGIS is the same individual who attempted to enter the Courthouse on or about May 22, 2023, as described above.

9. Based on my review of law enforcement databases and my conversations with other law enforcement officers, I know that ALEXANDRE REGIS, the defendant, is not an agent or employee with the FBI, the United States Secret Service, the National Security Agency, the United States Department of Homeland Security, United States Immigration and Customs Enforcement, the Bureau of Alcohol, Tobacco, Firearms and Explosives, or the Central Intelligence Agency.



WHEREFORE, I respectfully request that a warrant be issued for the arrest of ALEXANDRE REGIS, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.



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CHRISTOPHER HARPER  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
5<sup>th</sup> day of July, 2023.



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HONORABLE JENNIFER E. WILLIS  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK